

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

MARGARET A. WILSON,

Complainant,

v.

VECTREN ENERGY DELIVERY OF
OHIO, INC.,

Respondent.

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Case No. 18-0373-GA-CSS

ANSWER

In accordance with Ohio Adm. Code 4901-9-01(D), the Respondent, Vectren Energy Delivery of Ohio, Inc. (VEDO or the Company), for its answer to the complaint of Margaret A. Wilson, states:

FIRST DEFENSE

1. VEDO avers that Ms. Wilson is a customer receiving natural gas service at 2466 Rugby Road, Dayton, Ohio 45406 (the Premises).
2. VEDO avers that its records disclose no service interruptions over the last three years, other than to upgrade a service line and move an indoor meter outside following investigation of a service issue reported by Ms. Wilson in 2015. VEDO avers that there is a credit balance on the account at this time, and that its records do not disclose that service to the Premises has been threatened with disconnection. VEDO avers that as of this February, the meter at the Premises was continuing to register consumption.
3. VEDO is without sufficient knowledge or information to admit or deny the remaining allegations in the complaint, and generally denies any allegations not specifically admitted or denied in this Answer in accordance with Ohio Adm. Code 4901-9-01(D).

AFFIRMATIVE DEFENSES

SECOND DEFENSE

4. The complaint does not comply with the Commission's rules requiring "a statement which clearly explains the facts." Ohio Adm. Code 4901-9-01(B). The allegations are not in numbered-paragraph, but narrative, form; many of the allegations and statements in the complaint are compound; and the allegations omit numerous details necessary to answer them. The Company, has attempted, to the best of its ability, to answer the allegations, but reserves the right to amend its answer in the event it has incorrectly understood the allegations.

THIRD DEFENSE

5. The complaint fails to set forth reasonable grounds for complaint, as required by R.C. 4905.26.

FOURTH DEFENSE

6. The complaint does not set forth a claim for which relief may be granted.

FIFTH DEFENSE

7. VEDO at all times complied with the Ohio Revised Code Title 49; the applicable rules, regulations, and orders of the Public Utilities Commission of Ohio; and the Company's tariffs. These statutes, rules, regulations, orders and tariff provisions bar Ms. Wilson's claims.

SIXTH DEFENSE

8. VEDO avers that the complaint is barred by laches, waiver, and estoppel.

SEVENTH DEFENSE

9. VEDO reserves the right to raise other defenses as warranted by discovery in this matter.

WHEREFORE, VEDO respectfully requests an Order dismissing the complaint and granting it all other necessary and proper relief.

Dated: March 20, 2018

Respectfully submitted,

/s/ Andrew J. Campbell

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(All counsel are willing to accept service by email)

ATTORNEYS FOR VECTREN ENERGY
DELIVERY OF OHIO, INC.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Answer was served by mail to the following persons this 20th day of March, 2018:

Margaret A. Wilson
2466 Rugby Road
Dayton, Ohio 45406

/s/ Rebekah J. Glover
One of the Attorneys for Vectren Energy
Delivery of Ohio, Inc.

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Case No(s). 18-0373-GA-CSS

Summary: Answer electronically filed by Ms. Rebekah J. Glover on behalf of Vectren Energy Delivery of Ohio, Inc.